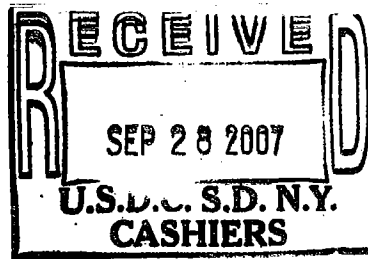


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



-----X
CORBIS CORPORATION,
a Nevada corporation,

Plaintiff,

v.

ZACK PRODUCTS CORPORATION,
a Pennsylvania corporation,

Defendant.
-----X

JUDGE CHIN

07 CIV 8425
No. 07 Civ. _____

ECF CASE

Jury Trial Demanded

COMPLAINT

Plaintiff Corbis Corporation, through its attorneys, complaining of Defendant Zack Products Corporation, alleges as follows:

1. This is a civil action seeking damages for copyright infringement and violations of the Digital Millennium Copyright Act ("DMCA"). As explained below, Defendant has made widespread and repeated use without permission of images owned or controlled by Plaintiff, contrary to the copyright laws.

JURISDICTION AND VENUE

2. Jurisdiction. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C., Sections 1331 and 1338(a), as this action involves claims brought under federal law, the Copyright Act of 1976, 17 U.S.C. §§ 101 *et seq.* This Court has personal jurisdiction over Defendant because, on information and belief, the Defendant transacts business in this State and because Defendant's access to and use of Plaintiff's

website constitutes agreement to the jurisdiction of this Court under the applicable terms and conditions.

3. Venue. Venue in this Court is proper pursuant to 28 U.S.C. Sections 1391(b) and 1400(a) because, on information and belief, the Defendant may be found in this District and because Defendant's access to and use of Plaintiff's website constitutes agreement to venue in this Court under the applicable terms and conditions.

THE PARTIES

4. Plaintiff Corbis Corporation ("Corbis") is a Nevada corporation, with its principal place of business at 902 Broadway, New York, New York 10010.

5. Upon information and belief, Defendant Zack Products Corporation ("Zack Products") is a corporation organized under the laws of the Commonwealth of Pennsylvania, with its principal place of business at 1008 Glencoe Avenue, Pittsburgh, Pennsylvania 15220, and a mailing address of Post Office Box 1841, Cranberry Township, Pennsylvania 16066.

BACKGROUND

6. Corbis is in the business of licensing photographs and fine art images on behalf of itself and the photographers and other licensors it represents. Generally, the images in Corbis' collection were taken by professional photographers who earn most or all of their livelihoods from the licensing fees Corbis is able to obtain for their images. Many of the images in Corbis' collection are produced by well-known photographers, and the collection includes some of the most recognized images in contemporary society.

7. The images in Corbis' collection are the subject of copyright protection under the laws of the United States, and at considerable expense and effort,

Corbis has protected images in its collection by systematically registering the copyrights to the images.

8. Corbis owns and operates a website located at the Internet address www.corbis.com. At Corbis' website, professional and consumer users are able to search hundreds of thousands of images from Corbis' collection and then pay to license the images for specific personal or commercial uses. Visitors to the www.corbis.com site interact with and obtain Corbis images from servers that are located in Seattle, Washington. Use of the www.corbis.com site and the images available for license there is governed by terms and conditions that require all disputes to be subject to the jurisdiction of state and federal courts in New York, New York.

9. Upon information and belief, Zack Products is a company based in Pennsylvania that is engaged in the business of providing records management systems and solutions and manufacturing stock and custom filing supplies and equipment. At all times relevant hereto, Zack Products owned and operated a website located at the Internet address www.zackproducts.com.

10. Upon information and belief, on an as yet unknown date, Zack Products or its agent visited Corbis' website, and without authorization, downloaded or copied numerous Corbis images that had previously been registered with the United States Copyright Office. Then Zack Products or its agent uploaded these same images to its www.zackproducts.com website for display on its website, as part of the marketing and advertising material presented on that site in order to attract business to Zack Products.

These same images were included on the www.zackproducts.com website through at least January 1, 2007, even after notice by Corbis to Zack Products.

11. Attached hereto as Exhibit A are true and correct copies of each of the Corbis images previously registered with the Copyright Office, with screen shots taken from the www.zackproducts.com website depicting these images from Corbis' collection that were used by Zack Products without authorization and displayed on its website.

12. At all relevant times hereto, Zack Products displayed these copyrighted images on its website without license or other authorization from Corbis.

13. Attached hereto as Exhibit B is a chart identifying the United States Copyright Office registration certificate numbers and registration dates for the Corbis images displayed on Exhibit A, evidencing that Corbis owns or controls the registered copyrights to the images that were displayed on the www.zackproducts.com website.

**FIRST CAUSE OF ACTION
COPYRIGHT INFRINGEMENT**

14. Corbis repeats and realleges the allegations of Paragraphs 1 through 13 as if fully set forth herein.

15. Corbis holds valid and exclusive registered copyrights to the images that are the subject of this action and that are evidenced by the copyright registration certificates referenced by Exhibit B.

16. Zack Products reproduced, distributed and displayed those images without Corbis' authorization.

17. The actions and conduct by Zack Products as described above infringe upon the exclusive rights of Corbis granted by Section 106 of the Copyright Act, 17 U.S.C. § 106, to display, reproduce, and distribute the registered copyrighted works to the public.

18. Such actions and conduct by Zack Products constitute copyright infringement under Section 501 of the Copyright Act, 17 U.S.C. § 501. Upon information and belief, the conduct of Defendant described above was willful.

19. As a result of the copyright infringement described above, Corbis is entitled to relief including, but not limited to, injunctive relief, actual or statutory damages, statutory costs and attorneys' fees, and prejudgment interest.

SECOND CAUSE OF ACTION
DMCA VIOLATION

20. Corbis repeats and realleges the allegations of Paragraphs 1 through 19 as if fully set forth herein.

21. All of the images that are the subject of this lawsuit were displayed on the www.corbis.com website with corresponding copyright management information ("CMI"). Upon information and belief, when Zack Products or its agents duplicated and displayed the subject images on its www.zackproducts.com website, it removed the CMI from each of the Corbis images used by Zack Products. The removal of the CMI from each of these images in order to induce, enable, facilitate, or conceal Zack Products' infringement of those images, as described above, constitutes a violation of the Digital Millennium Copyright Act, 17 U.S.C. § 1202(b).

22. As a result of the conduct described above, Plaintiff is entitled to relief including, but not limited to, injunctive relief, actual or statutory damages, statutory costs and attorneys' fees, and prejudgment interest.

JURY TRIAL DEMAND

23. Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff demands a trial by jury.

RELIEF REQUESTED

WHEREFORE, Corbis prays for relief as follows:

1. For an order permanently enjoining Defendant from infringing Corbis' copyrighted images pursuant to Section 502 of the Copyright Act, 17 U.S.C. § 502, and permanently enjoining Defendant from displaying Corbis' copyrighted images pursuant to the DMCA, 17 U.S.C. § 1203(b);
2. For an award of Defendant's profits and for damages in such amount as may be found, or for statutory damages of (a) not less than \$750 or more than \$30,000 per image pursuant to 17 U.S.C. Section 504(c)(1) or, upon a finding of willful infringement pursuant to 17 U.S.C. Section 504(c)(2), up to \$150,000 per image, and (b) not less than \$2,500 or more than \$25,000 per image pursuant to 17 U.S.C. Section 1203(c)(3)(B);
3. For an award of costs, pursuant to 17 U.S.C. Sections 505 and 1203(b)(4);
4. For an award of reasonable attorneys' fees, pursuant to 17 U.S.C. Sections 505 and 1203(b)(5);
5. For an award of prejudgment interest on the amount of any award to Plaintiff; and

6. For such other and further relief as the Court deems just and proper.

Dated: New York, New York
September 28, 2007

COVINGTON & BURLING LLP

By: Matthew J. Watkins
Matthew J. Watkins

620 Eighth Avenue
New York, New York 10018
Telephone: (212) 841-1000
Facsimile: (212) 841-1010

Attorneys for Plaintiff
ZACK PRODUCTS CORPORATION

Of Counsel:

COVINGTON & BURLING LLP
Simon J. Frankel
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San Francisco, California 94111
Telephone: (415) 591-6000
Facsimile: (415) 591-6091

Exhibit A



228-I-186-S6610 | © Chuck Savage/CORBIS | RM
Dimensions: 80 x 80 pixels

IMAGE URL <http://www.zackproducts.com/images/purchaseViaCard.gif>

PAGE URL <http://www.zackproducts.com/businessmain.aspx>

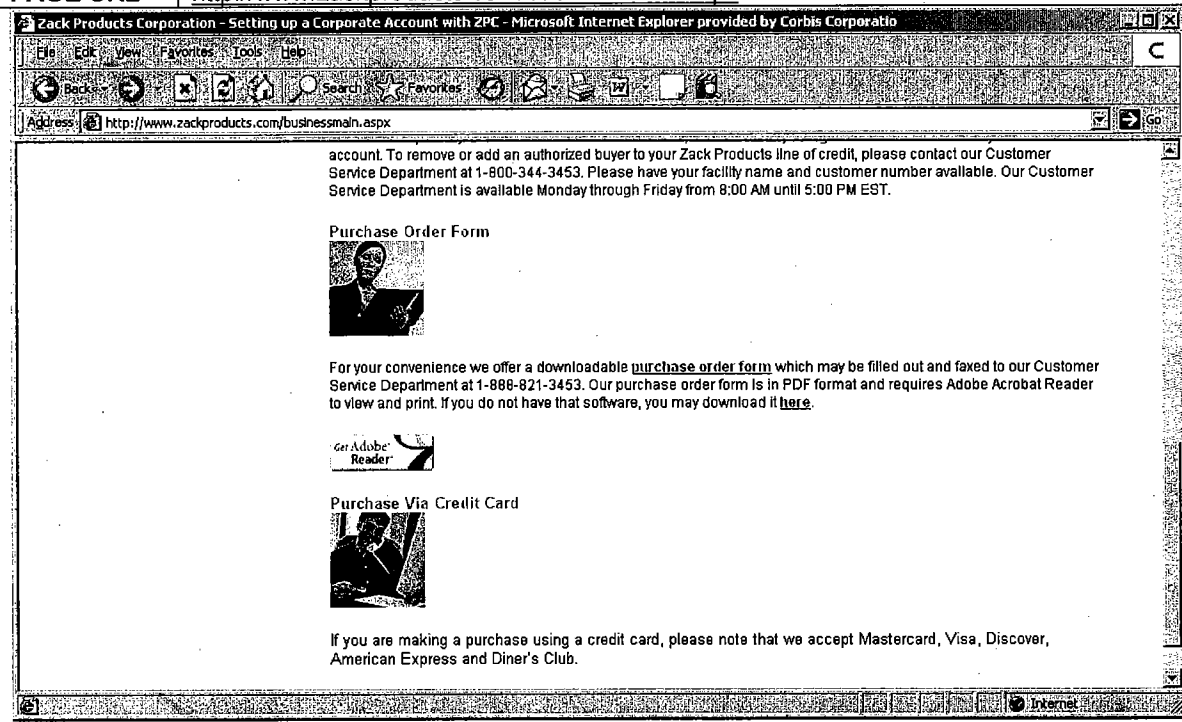
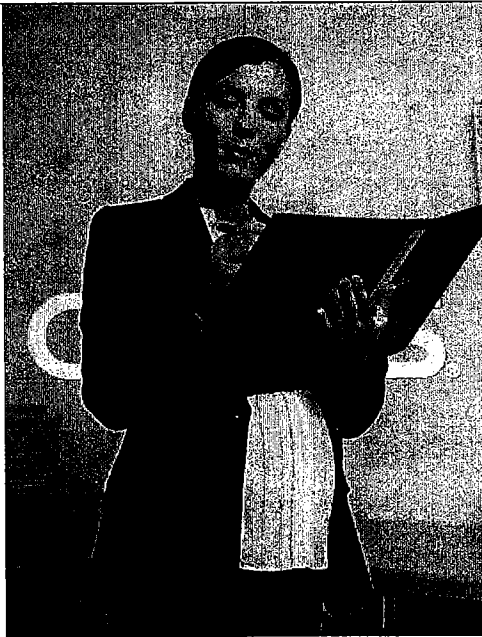


Exhibit A



42-15245998 | © Holger Winkler/zefa/Corbis | RM (Premium)
Dimensions: 80 x 80 pixels

IMAGE URL http://www.zackproducts.com/images/purchase_form.gif

PAGE URL <http://www.zackproducts.com/businessmain.aspx>

Zack Products Corporation - Setting up a Corporate Account with ZPC - Microsoft Internet Explorer provided by Corbis Corporation

File Edit View Favorites Tools Help

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Address: <http://www.zackproducts.com/businessmain.aspx> Go


Purchase Authorization

If your facility has a corporate account with a line of credit, you can make purchases using your corporate account number as an authorized buyer. For purchase authorization through your facility, please contact our Customer Service Department at 1-800-344-3453. Please have your facility name and customer number available. Our Customer Service Department is available Monday through Friday from 8:00 AM until 5:00 PM EST.

Authorized Buyer

An authorized buyer is anyone who with a corporate account that is authorized to make purchases using their facility's line of credit account. Although the authorized buyer can make purchases through Zack Products Corporation, he/she can not request account information, make changes to the account, and is not responsible for repayment of the Account. The primary line of credit account holder is responsible for any charges that the authorized buyer incurs on the account. To remove or add an authorized buyer to your Zack Products line of credit, please contact our Customer Service Department at 1-800-344-3453. Please have your facility name and customer number available. Our Customer Service Department is available Monday through Friday from 8:00 AM until 5:00 PM EST.

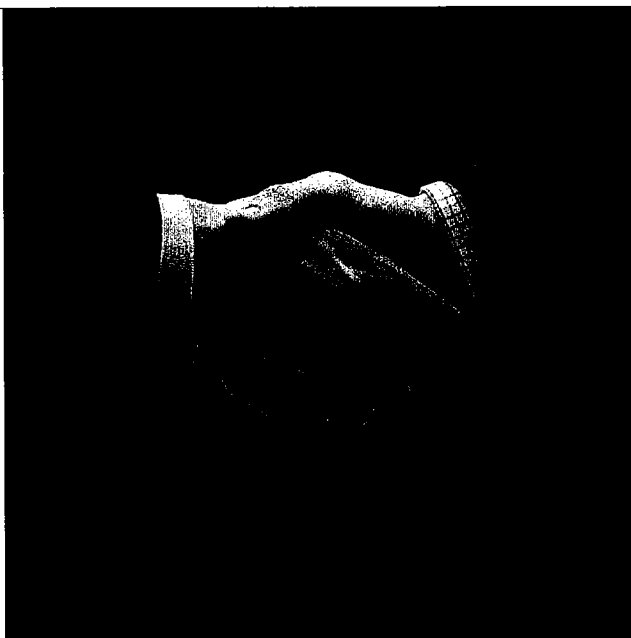
Purchase Order Form



For your convenience we offer a downloadable [purchase order form](#) which may be filled out and faxed to our Customer Service Department at 1-888-821-3453. Our purchase order form is in PDF format and requires Adobe Acrobat Reader to view and print. If you do not have that software, you may download it [here](#).

Internet

Exhibit A



42-15292019 | © Dave Michaels/zefa/Corbis | RM (Premium)
Dimensions: 80 x 80 pixels

IMAGE URL http://www.zackproducts.com/images/Thumbs/purchasing_tn.gif

PAGE URL <http://www.zackproducts.com/Hospitals--C4581.aspx>

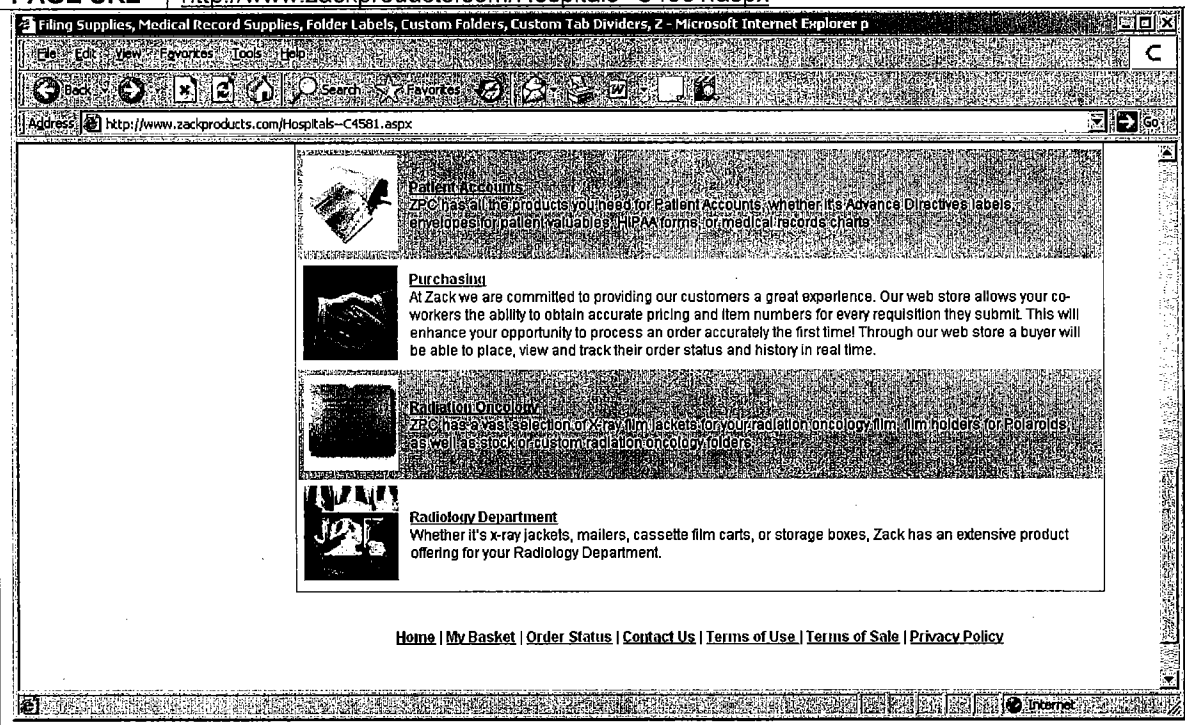


Exhibit A



42-15298451 | © Oliver Eltinger/zefa/Corbis | RM (Premium)
 Dimensions: 55 x 55 pixels

IMAGE URL	http://www.zackproducts.com/phone.gif
PAGE URL	http://www.zackproducts.com/contactus.aspx

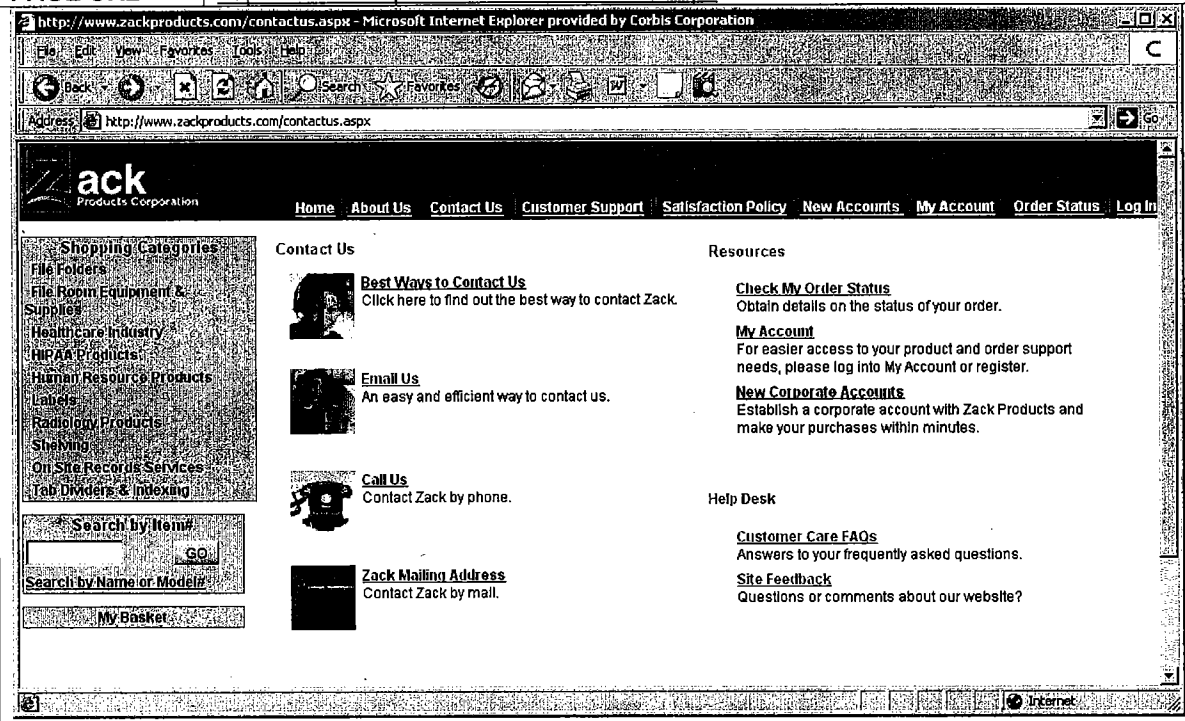


Exhibit A



42-15444055 | © Dennis Degnan/Corbis | RM
Dimensions: 80 x 80 pixels

IMAGE URL http://www.zackproducts.com/images/Thumbs/medicalRecords_tn.gif

PAGE URL <http://www.zackproducts.com/Hospitals--C4581.aspx>

Filing Supplies, Medical Record Supplies, Folder Labels, Custom Folders, Custom Tab Dividers, Z - Microsoft Internet Explorer p

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Address <http://www.zackproducts.com/Hospitals--C4581.aspx> Go

patients. We also provide sterilization products and a wide array of laboratory labels.

Medical Records
ZPC specializes in medical records products and we offer an extensive product offering specifically designed for your Medical Records Department. Whether it's indexing systems, color coded folders, or filing equipment, we carry what you need from A to Z.

Medical Staff Office
ZPC has designed and manufactured the most innovative Physician Credentialing Folders the industry has to offer. Our Credentials are widely recognized in the healthcare industry as the essential product for ensuring compliance and a state of the art filing system. We offer both stock solutions or will uniquely design a Credential to meet the specific needs of your Medical Staff Office.

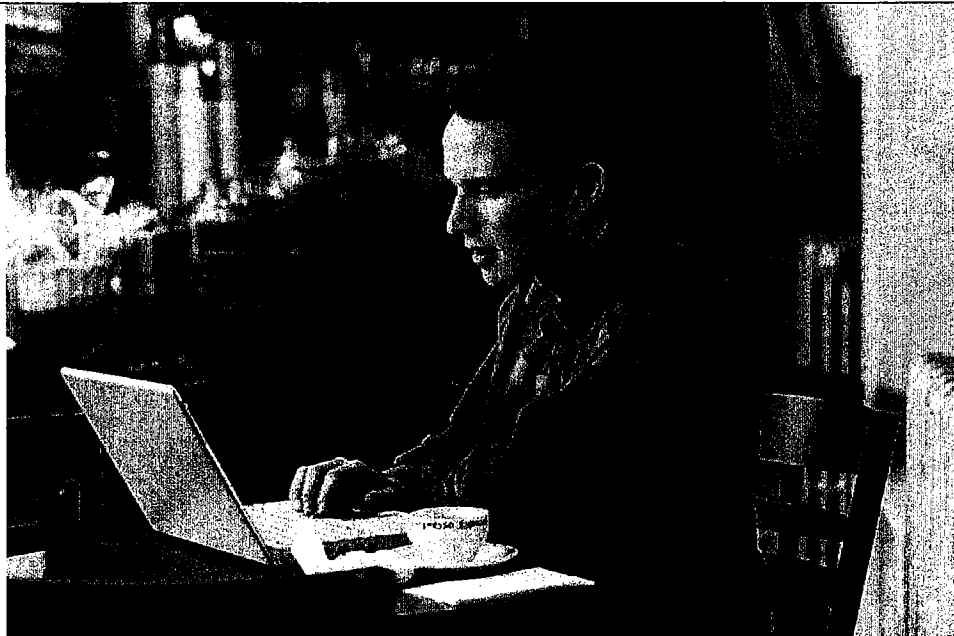
Nursing Administration
Whether you need patient unit divider sets, ring binders, or sheet protectors, Zack specializes in integrating the flow of patient information between nursing and medical records.

Patient Accounts
ZPC has all the products you need for Patient Accounts, whether it's Advanta Directives labels, envelopes for patient valuables, HIPAA forms, or medical records charts.

Purchasing
At Zack we are committed to providing our customers a great experience. Our web store allows your co-workers the ability to obtain accurate pricing and item numbers for your requisitioning the equipment. This will

Internet

Exhibit A



42-15709031 | © Jim Cragmyle/Corbis | RM
Dimensions: 80 x 80 pixels

IMAGE URL	http://www.zackproducts.com/images/apply_credit.gif
PAGE URL	http://www.zackproducts.com/businessmain.aspx

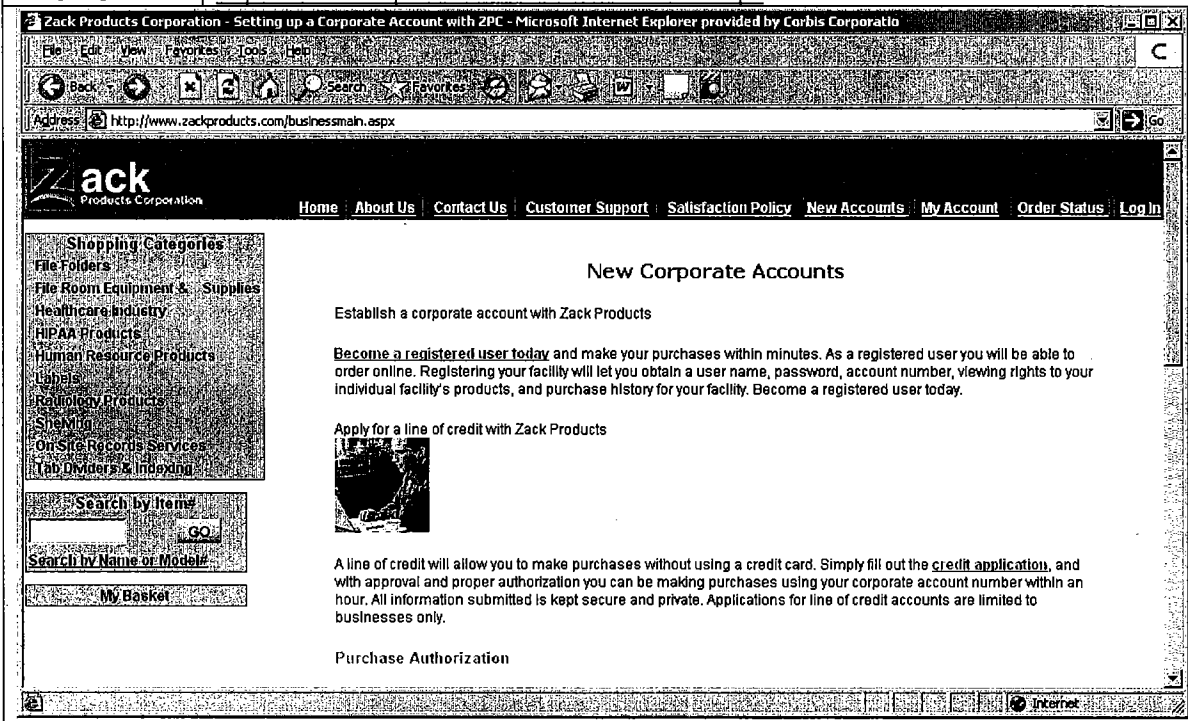
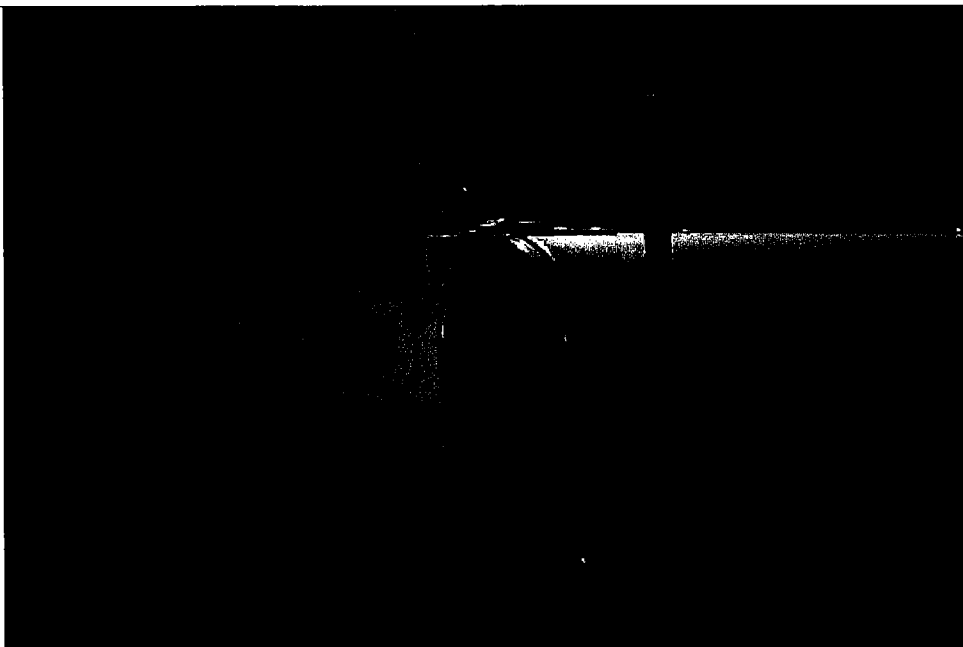


Exhibit A



72414 | © Bruce Burkhardt/CORBIS | RM
Dimensions: 55 x 55 pixels

IMAGE URL <http://www.zackproducts.com/mail.gif>

PAGE URL <http://www.zackproducts.com/contactus.aspx>

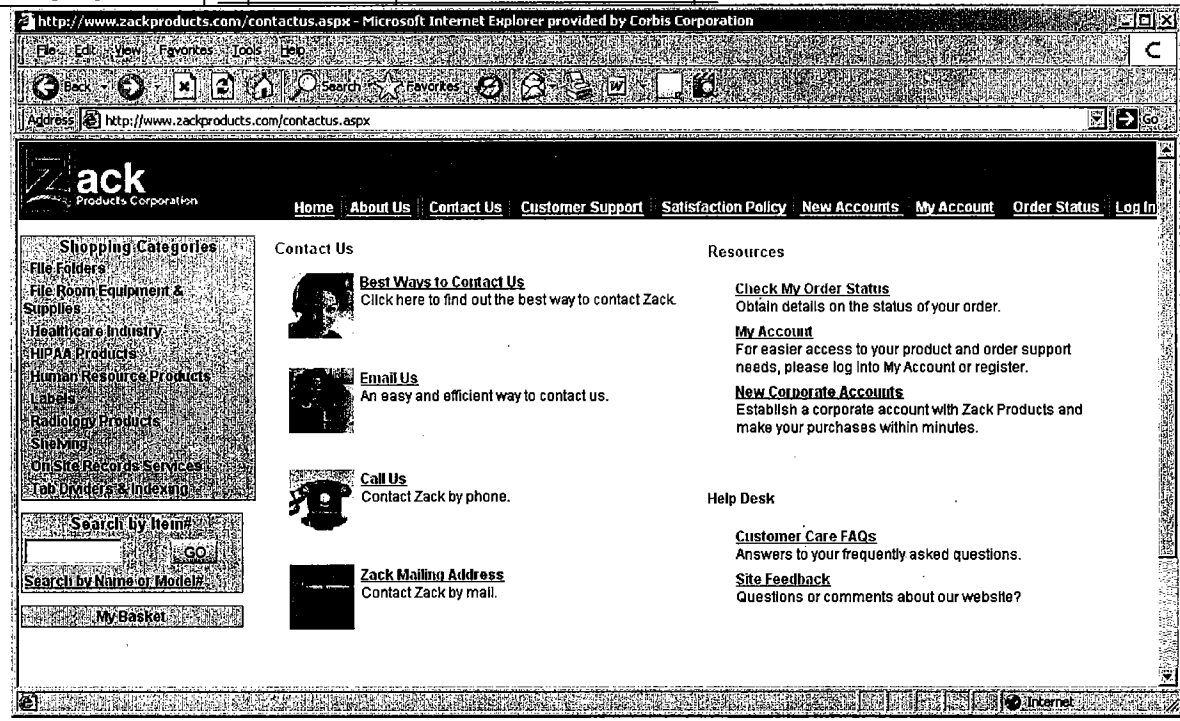


Exhibit A



AX051832 | © ER Productions/CORBIS | RM
Dimensions: 80 x 80 pixels

IMAGE URL	http://www.zackproducts.com/images/Thumbs/labels/labelsIndustry.gif
PAGE URL	http://www.zackproducts.com/category.aspx?SID=1&Category_ID=4636&ClearCache=1

Filing Supplies, Medical Record Supplies, Folder Labels, Custom Folders, Custom Tab Dividers, Z - Microsoft Internet Explorer p

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Healthcare Industry
HIPAA Products
Human Resource Products
Labels
Radiology Products
Shelving
On Site Records Services
Tab Dividers & Indexing

Search by Item#
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Search by Name or Model#

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Color Coded Labels
Whether you're starting a new filing system or need to match an existing system, we have the solutions for you. Choose from a variety of color coded filing labels, from numeric systems to alphabetical systems. At ZPC we have the ability to match just about any color coded system. We also offer starter kits for alphabetical and numeric systems.

All Purpose File Room Labels
From the traditional and typical to the uniquely designed, ZPC offers a wide array of all purpose file room oriented labels to meet your needs. Choose from a variety of different sizes and colors, from circular dot labels, laser name labels, repair and reinforcement labels, correction labels, year code labels and many more.

How To Start A Color Coded System
Zack Products has developed alphabetical and numeric label systems designed for use with top and end tab filing systems. The benefits of color coded systems are a reduction in misfiles and ability to locate lost records quickly thru the use of color. We offer starter kits in 3 ring binders or label systems that are packaged in rolls.

Labels Shop By Industry
From the routine to the uniquely designed, ZPC offers a family of labels for various record intensive industries. Select your industry and shop for labels specifically designed for your department.

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Exhibit A



AX061722 | © Lucidio Studio Inc./CORBIS | RM
Dimensions: 80 x 80 pixels

IMAGE URL http://www.zackproducts.com/images/Thumbs/inserts/custom_inserts_icon.gif


PAGE URL <http://www.zackproducts.com/Film-X-Ray-Jackets-C4694.aspx>

Filing Supplies, Medical Record Supplies, Folder Labels, Custom Folders, Custom Tab Dividers, Z - Microsoft Internet Explorer p


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Address <http://www.zackproducts.com/Film-X-Ray-Jackets-C4694.aspx> Go




Special Procedure Film Jackets
Film Jackets have been uniquely designed for a variety of specialty areas, departments and procedures. Ultrasound, Radiation Oncology, Angiography are a few examples of our specialty jackets. These jackets have stock copy printing and sizes that will accommodate most standard film sizes.



Non-Printed Color and Manila Film Jackets
Utilize color film jackets to identify particular films or documents. We offer these plain film jackets with pockets and in various sizes. You may have your facility name imprinted.



Color Coded Film Jackets
ZPC has three (3) color coded x-ray film jacket systems in inventory. Our film jackets contain two (2) terminal digit color bars and a year code bar. Each system is also available with or without report pockets. You may add your facility name imprint. Custom color coded systems are also available.



Custom Printed Film Jackets
Economical, fast, no hassle approach towards getting your design and facility name on a film jacket. ZPC has a solution for film jacket printing. We will imprint stock film jackets for quantities as low as 1,000 jackets.

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Exhibit A



AX067332 | © Jose Luis Pelaez, Inc./CORBIS | RM
Dimensions: 80 x 80 pixels

IMAGE URL	http://www.zackproducts.com/images/Thumbs/HippalIndex.gif
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Filing Supplies, Medical Record Supplies, Folder Labels, Custom Folders, Custom Tab Dividers, Z - Microsoft Internet Explorer p

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Products Corporation

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Shopping Categories

- File Folders
- File Room Equipment & Supplies
- Healthcare Industry
- HIPAA Products**
- Human Resource Products
- Labels
- Radiology Products
- Shelving
- On Site Records Services
- Tab Dividers & Indexing

Search by Item#

Search by Name or Model#

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HIPAA Products & Solutions

< Prev Category 3 of 8 Next >

HIPAA Label Solutions
 ZPC provides several HIPAA compliant labeling systems to support your patient's confidentiality. We offer Protected Health Information labels, Privacy Restriction HIPAA Labels and Acknowledgement of Privacy Labels that will alert staff to privacy restrictions.

HIPAA Index Solutions
 Our HIPAA tab dividers and indexing is uniquely designed for instant recognition of Protected Health Information paperwork as well as other areas of privacy and security information. ZPC has designed indexing specifically for all HIPAA related solutions. Our HIPAA tab dividers and indexing is uniquely designed for instant recognition of Protected Health Information paperwork as well as other areas of privacy and security information. ZPC has designed indexing specifically for all HIPAA related solutions.

HIPAA Product Solutions
 ZPC has designed forms, record transfer envelopes, carts and offers reference books that will facilitate HIPAA compliance. Our uniquely designed HIPAA compliant products will assist you in the requirements outlined by HIPAA regulations.

Internet

Exhibit A



AX067397 | © Jose Luis Pelaez, Inc./CORBIS | RM
Dimensions: 80 x 80 pixels

IMAGE URL <http://www.zackproducts.com/images/Thumbs/admissions1.gif>

PAGE URL <http://www.zackproducts.com/Hospitals--C4581.aspx>

Filing Supplies, Medical Record Supplies, Folder Labels, Custom Folders, Custom Tab Dividers, 2 - Microsoft Internet Explorer p

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 File Folders
 File Room Equipment & Supplies
 Healthcare Industry
 HIPAA Products
 Human Resource Products
 Labels
 Radiology Products
 Shelving
 On Site Records Services
 Tab Dividers & Indexing


Search by Item#


Search by Name or Model#


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Hospitals

Category 1 of 3 [Next >>](#)

 **Admissions**
 Whether it's Advance Directives labels, envelopes for patient valuables, HIPAA forms, or medical records charts, Zack has all the products you need for your Admissions Department.

 **Emergency**
 ZPC provides products such as transport carriers for x-ray films, Advance Directives labels, patient valuables envelopes and various HIPAA forms. You can find the solutions you need for your Emergency Department at ZPC.

 **Human Resources**
 Whether it's employee personnel file folders or secure fireproof cabinets, ZPC specializes in file room supplies for hospital Human Resources Departments.

Internet

Exhibit A



CSM003881 | © Michael Mullan/CORBIS | RM
Dimensions: 80 x 80 pixels

IMAGE URL http://www.zackproducts.com/Film_Xray_allPurps_icon.gif

PAGE URL <http://www.zackproducts.com/Film-X-Ray-Jackets-C4694.aspx>

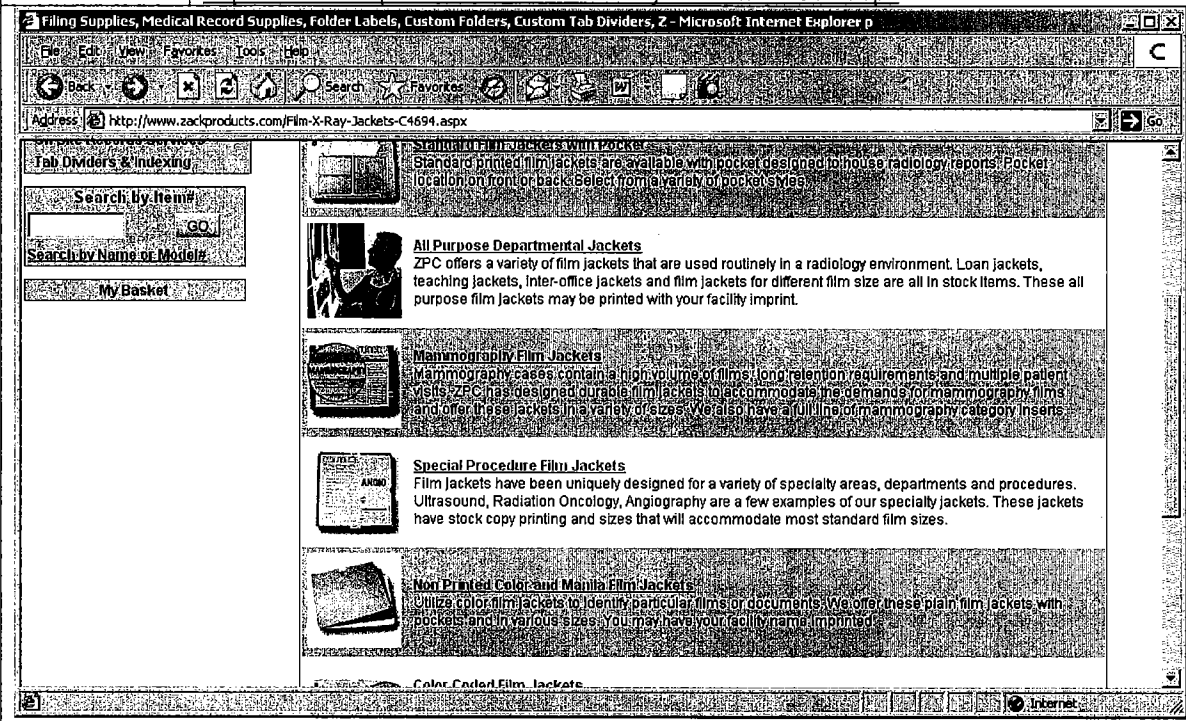


Exhibit A



NQ001295 | © Michael Prince/CORBIS | RM
Dimensions: 80 x 80 pixels

IMAGE URL	http://www.zackproducts.com/images/Thumbs/onsite_relocate_icon.gif
PAGE URL	http://www.zackproducts.com/category.aspx?SID=1&Category_ID=4780&ClearCache=1

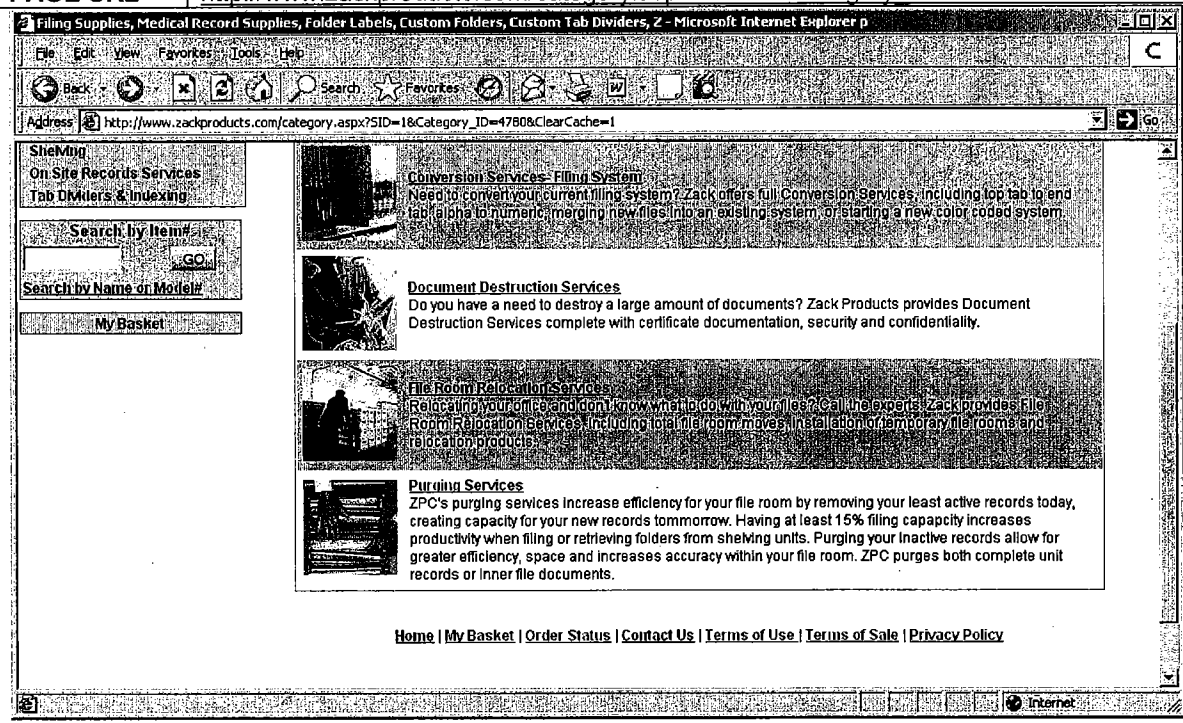


Exhibit A



SC-003-0166 | © Jose Luis Pelaez, Inc./CORBIS | RM
Dimensions: 80 x 80 pixels

IMAGE URL http://www.zackproducts.com/images/Thumbs/nursing_tn.gif

PAGE URL <http://www.zackproducts.com/Hospitals--C4581.aspx>

Filing Supplies, Medical Record Supplies, Folder Labels, Custom Folders, Custom Tab Dividers, Z - Microsoft Internet Explorer p

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Back Forward Stop Home Search Favorites

Address <http://www.zackproducts.com/Hospitals--C4581.aspx> Go

...ing equipment, we carry what you need from A to Z.

Medical Staff Offices
ZPC has designed and manufactured the most innovative Physician Credentialing Folders the industry has to offer. Our Credfiles are widely recognized in the healthcare industry as the essential product for ensuring compliance and a state-of-the-art filing system. We offer both stock solutions or will uniquely design a Credfile to meet the specific needs of your Medical Staff Office.

Nursing Administration
Whether you need patient unit divider sets, ring binders, or sheet protectors, Zack specializes in integrating the flow of patient information between nursing and medical records.

Patient Accounts
ZPC has all the products you need for Patient Accounts, whether it's Advance Directives labels, envelopes for patient valuables, HIPAA forms, or medical records charts.

Purchasing
At Zack we are committed to providing our customers a great experience. Our web store allows your co-workers the ability to obtain accurate pricing and item numbers for every requisition they submit. This will enhance your opportunity to process an order accurately the first time! Through our web store a buyer will be able to place, view and track their order status and history in real time.

Radiation Oncology
ZPC has a vast selection of X-ray film jackets for your radiation oncology film, film holders for Polaroids, as well as contact sheets, film processing and more.

Internet

Exhibit A



SC-022-0154 | © Pete Saloutos/CORBIS | RM
Dimensions: 80 x 80 pixels

IMAGE URL http://www.zackproducts.com/images/Thumbs/radiology_tn.gif

PAGE URL <http://www.zackproducts.com/Hospitals--C4581.aspx>

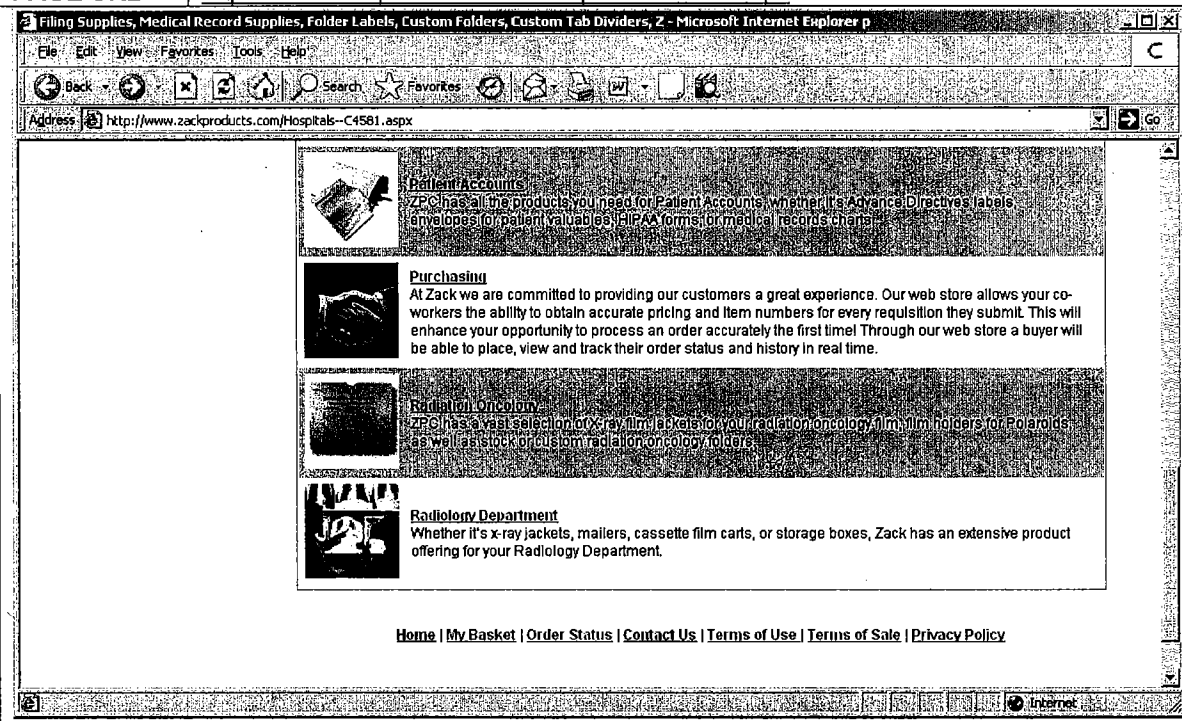


EXHIBIT B

Image ID	Status	Copyright Date	Certificate
228-I-186-S6610	Registered	12/03/2002	VA 1-181-996
42-15245998	Registered	06/24/2005	VA 1-314-174
42-15292019	Registered	06/24/2005	VA 1-314-174
42-15298451	Registered	06/24/2005	VA 1-314-174
42-15444055	Registered	08/22/2005	VA 1-318-690
42-15709031	Registered	10/21/2005	VA 1-338-772
72414	Registered	03/16/2001	VA 1-115-519
AX051832	Registered	09/25/2002	VA 1-199-164
AX061722	Registered	08/20/2002	VA 1-152-437
AX067332	Registered	08/26/2002	VA 1-152-436
AX067397	Registered	08/26/2002	VA 1-152-436
CSM003881	Registered	08/20/2002	VA 1-152-437
NQ001295	Registered	08/26/2002	VA 1-152-436
SC-003-0166	Registered	08/15/2002	VA 1-145-485
SC-022-0154	Registered	08/15/2002	VA 1-145-485

CASE NUMBER

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CORBIS CORPORATION,
a Nevada corporation,

Plaintiff,

-against-

ZACK PRODUCTS CORPORATION,
a Pennsylvania corporation,

Defendant.

COMPLAINT

620 EIGHTH AVENUE
NEW YORK, NY 10018
TEL 212.841.1000

ATTORNEYS FOR

COVINGTON & BURLING LLP

CORBIS CORPORATION
